

1 Patrick R. Leverty
2 **LEVERTY & ASSOCIATES LAW CHTD**
3 832 Willow Street
4 Reno, Nevada 89502
5 Telephone: (775) 322-6636
6 Facsimile: (213) 322-3953
7 Email: pat@levertylaw.com

Liaison Counsel for Lead Plaintiffs

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

In Re Spectrum Pharmaceuticals, Inc. Securities
Litigation

This Document Relates To: All Actions

Master File No. 2:16-cv-02279-RFB-GWF

**NOTICE OF SETTLEMENT IN
PRINCIPLE AND INTENT TO SEEK
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT PURSUANT TO
FED. R. CIV. P. 23(e)**

PLEASE TAKE NOTICE that the parties have reached an agreement in principle to settle all claims related to this class action. The parties have executed a Memorandum of Understanding, memorializing the settlement's terms, and shall negotiate a comprehensive stipulation of settlement. Pursuant to Fed. R. Civ. P. 23(e), Lead Plaintiffs Michael Bestwick and Mark Hawkins anticipate filing a motion for preliminary approval of this class action settlement on or around September 6, 2019. The parties respectfully request that the Court's April 10, 2019 Minute Order, ECF No. 128, staying this action, remains in effect pending final documentation of the settlement and the settlement approval process.

1 Dated: July 26, 2018

Respectfully submitted,

2 **LEVERTY & ASSOCIATES LAW CHTD**

3 /s/ Patrick R. Leverty

4 Patrick R. Leverty (Nev. Bar No. 8840)
5 William Ginn
6 Reno Gould House
7 832 Willow Street
8 Reno, NV 89502
9 Telephone: (775) 322-6636
Facsimile: (775) 322-3953
Email: pat@levertylaw.com

10 ***Liaison Counsel for Lead Plaintiffs***

11 **THE ROSEN LAW FIRM, P.A.**

12 Jacob A. Goldberg
Leah Heifetz
13 101 Greenwood Avenue, Suite 440
Jenkintown, PA 19012
14 Telephone: (215) 600-2187
Facsimile: (212) 202-3827
15 Email: jgoldberg@rosenlegal.com
lheifetz@rosenlegal.com

16 and

17 Laurence M. Rosen
Phillip Kim
18 275 Madison Avenue, 34th Floor
New York, NY 10016
19 Telephone: (212) 686-1060
Facsimile: (212) 202-3827
20 Email: lrosen@rosenlegal.com
pkim@rosenlegal.com

**BRONSTEIN GERWITZ
& GROSSMAN, LLC**

Peretz Bronstein
Shimon Yiftach
60 East 42nd Street, Suite 4600
New York, NY 10165
Telephone: (212) 697-6484
Facsimile: (212) 697-7296
Email: peretz@bgandg.com
shimony@bgandg.com

Co-Lead Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that, on July 26, 2019, I electronically filed the foregoing **NOTICE OF SETTLEMENT IN PRINCIPLE AND INTENT TO SEEK PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT PURSUANT TO FED. R. CIV. P. 23(e)** with the Clerk of Court using the CM/ECF system, which will send notification of such to all CM/ECF participants.

THE ROSEN LAW FIRM, P.A.

By: /s/ Patrick R. Leverty
Patrick R. Leverty

Liaison Counsel for Lead Plaintiffs